

# OSBORN LAW P.C.

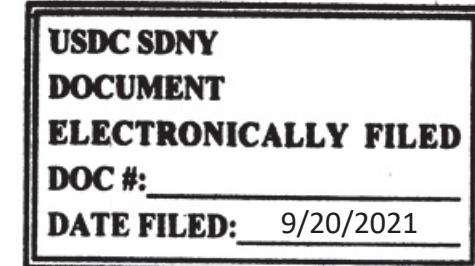
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Request GRANTED. Plaintiff's motion due no later than November 22, 2021; Defendant's response/cross-motion due no later than January 21, 2022; any reply from Plaintiff due no later than February 11, 2022. SO ORDERED.

Dated: September 20, 2021

*Stewart D. Aaron*



September 20, 2021

## VIA ECF

Honorable Stewart D. Aaron  
United States Magistrate Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Re: *Ortiz v. Commissioner of Social Security,*  
Civil Action No. 1:21-cv-01042-SDA

Dear Judge Aaron,

We write on behalf of plaintiff, Julissa Acosta Ortiz, and with the consent of the defendant, to request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on September 21, 2021. Plaintiff respectfully requests an extension of time up to and including October 9, 2021. This is plaintiff's first request for an extension.

The delay in preparation of the Administrative Records due to COVID-related issues, and the recent easing of those problems, has resulted in numerous closely scheduled (and overlapping) briefing deadlines. We hope and expect that the easing will continue over the next several months and that by the end of the year, neither the Agency nor the claimants will need to request as many modifications to the briefing schedules as have been requested in the past.

Subject to the approval of the Court, the parties propose the following revised briefing schedule:

Honorable Stewart D. Aaron  
September 20, 2021  
Page 2

- a. Plaintiff to serve her motion for judgment on the pleadings on or before **November 22, 2021**;
- b. Defendant to serve its response/cross-motion on or before **January 21, 2022**; and
- c. Plaintiff to serve her reply (if any) on or before **February 11, 2022**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
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cc: Graham Morrison, Esq. (by ECF)